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MEMO ENDORSED

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Via Electronic Court Filing

Hon. Valerie E. Caproni
United States Courthouse
500 Pearl St.
New York, New York 10007-1312

Re: **UDG Management, LLC et al. v. Ironshore Indemnity Corp.**
Case Number: 1:24-cv-02777-VEC
Request for Stay

Dear Judge Caproni:

This firm represents the interests of Plaintiff Robert Kudla, DMD and Hill Wallack LLP, in the above-referenced case. On June 30, 2025, we received an email from Dana-Kristie Pineda, who is the legal assistant for Michael Kimm, Esq., counsel for Plaintiff UDG Management, LLC ("UDG"). Ms. Pineda advised that UDG would be seeking an extension of the briefing schedule for the pending summary judgment motion and the anticipated cross motion to be filed by Plaintiffs. She further advised that Mr. Kimm has been in the intensive care unit of Hackensack Hospital for some weeks and is having difficulty communicating. A copy of the June 30 email is attached hereto. On that same date, I called Ms. Pineda to suggest Plaintiff's seek a stay to allow Mr. Kimm time to recover or other counsel to be assigned. Ms. Pineda said she would seek consent. I have not heard back from her. Defense counsel has consented to my request to seek a stay from the Court.

With the consent of UDG, we respectfully request a stay of this matter until UDG is able to secure counsel be that Mr. Kimm or otherwise.

We appreciate your Honor's courtesies.

Respectfully submitted,
HILL WALLACK LLP

/s/ Susan L. Swatski
Susan L. Swatski

cc: all parties via ECF

Intervenor Plaintiffs did not attach the referenced June 30 email to their letter. Additionally, the letter notes that Ms. Pineda stated that she would seek consent but that Ms. Swatski has not heard back from her; however, the letter then requests a stay "with the consent of UDG." Intervenor Plaintiffs are ordered to file a letter clarifying this inconsistency and to also attach the June 30 email by July 9, 2025.

SO ORDERED.

7/7/2025



HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE